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**Hearing Date: June 4, 2015 at 10:30 a.m.**  
**Objection Deadline: May 28, 2015**

*Special Counsel to Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF MOTION TO DEDESIGNATE CERTAIN DOCUMENTS  
DESIGNATED AS CONFIDENTIAL BY ALBOURNE AMERICA LLC**

**PLEASE TAKE NOTICE** that Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities, LLC and the estate of Bernard L. Madoff, by and through the Trustee’s undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, Courtroom

723, New York, New York 10004, on **June 4, 2015 at 10:30 a.m.**, or as soon thereafter as counsel may be heard, for an Order, pursuant to the Litigation Protective Order dated June 6, 2011 (ECF No. 4137) (the “Litigation Protective Order”), and the relevant sections of the United States Bankruptcy Code, 11 U.S.C. § et seq., and Federal Rules of Bankruptcy Procedure referred to therein, granting the Trustee’s Motion to Dedesignate Certain Documents Designated as Confidential by Albourne America LLC.

**PLEASE TAKE FURTHER NOTICE** that responses or objections to the Motion, if any, must be in writing, shall conform to the Bankruptcy Rules and other applicable rules and orders of this Court, and shall be filed in accordance with General Order M-399 and the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York (available at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by no later than **5:00 p.m. on May 28, 2015** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Windels Marx Lane & Mittendorf, LLP, 156 West 56<sup>th</sup> Street, New York, New York 10019, Attn: Howard L. Simon and Kim M. Longo and (b) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington D.C. 20005, Attn: Kevin Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

**PLEASE TAKE FURTHER NOTICE** that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Dated: New York, New York  
May 8, 2015

Respectfully submitted,

/s/ Howard L. Simon

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SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate  
of Bernard L. Madoff*